

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

Conditional Major Permit No. F-04-024 (Revision 1)

ROAD CONSTRUCTION PRODUCTS

CLARKSON, KENTUCKY

February 7, 2007

RITA ARGUELLO, REVIEWER

Plant I.D. # 21-085-00033

Application Log APE200700001

AI # 38215

ADMINISTRATIVE AMENDMENT (REVISION 1)

The first page has been changed, the new company name, ROAD CONSTRUCTION PRODUCTS, has been used.

ORIGINAL ISSUANCE

SOURCE DESCRIPTION:

Mid-Park, Inc., an existing conditional major source (for VOC and HAP) submitted a permit modification to its existing O-93-045 permit.

Mid-Park, Inc. is a manufacturer of highway related metal products, where the main production is sign post holders.

COMMENTS:

PUBLIC AND U.S. EPA REVIEW:

Public notice was placed in the Grayson County News Gazette on August 12, 2004. The comment period ended on September 25, 2004. There were no comments from the public. There were no comments from U.S. EPA.

The permit modification incorporated a few changes:

- 1) Emission Point 01 (A,B,C,D,E,F,G,H,J) – 9 MIG Welders:
 - i) Addition of 5 MIG welders since the last permit (O-93-045).
 - ii) Applicable regulations, requirements and descriptions have been updated in the latest permit.
 - iii) No control equipment.
- 2) Emission Point 02 (4A & 4B) – 2 Dip Tanks:
 - i) One dip tank has been removed since the last permit (O-93-045). 4C was scrapped.
 - ii) Applicable regulations, requirements and descriptions have been updated in the latest permit.
 - iii) No control equipment.

- 3) There is no equipment left in the Hwy 54 site.

EMISSION AND OPERATING CAPS DESCRIPTION:

- i) The source requested limitation on the hours of operation. Hours of operation shall be limited so as not to exceed the emission limitations specified in the latest permit.
- ii) Plant-wide 12-month rolling emission of Volatile Organic Compound (VOC) shall not exceed 90 tons/yr, to preclude Major Source applicability.
- iii) Plant-wide 12-month rolling emission of total individual HAP shall not exceed 9 tons per year, to preclude Major Source applicability.
- iv) Plant-wide 12-month rolling emission of total combined HAP shall not exceed 22.5 tons per year, to preclude Major Source applicability.
- v) 2-butoxyethanol emissions shall not exceed 16.68 lbs/hr.
- vi) Xylene emissions shall not exceed 29.95 lbs/hr.

CREDIBLE EVIDENCE:

This permit contains provisions, which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.